

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)


**DEFENDANT GOOGLE LLC'S NOTICE OF
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Sara B. Tomezsko with accompanying exhibits, and the Declaration of John Schrim, Defendant Google LLC, through its undersigned counsel, hereby moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, 500 Pearl Street, Room 6B, New York, New York 10007, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020 (ECF 23), and the Court's Individual Rules and Procedures for Civil Cases, Rule I.D for an Order permitting it to retain under seal excerpts from a third party witness's confidential severance agreement submitted by both parties in connection with Google's request for leave to take *de bene esse* depositions, filed as ECF Nos. 262 and 265.

PLEASE TAKE FURTHER NOTICE that, Plaintiff's opposition, if any, shall be due on December 16, 2022, and Google's reply due December 23, 2022.

Dated: New York, New York
December 2, 2022

PAUL HASTINGS LLP


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GOOGLE LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this December 2, 2022, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO RETAIN DOCUMENTS UNDER SEAL, MEMORANDUM OF LAW, the accompanying DECLARATION OF SARA B. TOMEZSKO and all exhibits thereto, the accompanying DECLARATION OF JOHN SCHRIM, and PROPOSED ORDER to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: New York, New York
December 2, 2022



Sara B. Tomezsko